

to be reworked when the original product becomes worn. The reworking process involves the removal of the chrome plating prior to any machining of the piece. After the chrome plating is removed, the piece can be machined to requested specifications and shipped back to the customer, basically recycling the piece.

Roto-Die generates several types of waste oil to include cutting oils, hydraulic oils, and machine oils. The waste oils are generated at the rate of approximately 1,600 pounds per month and are generally described by the Missouri hazardous waste code D098. The waste oils are presently handled by Laidlaw Environmental Services, Inc. (MOD980554653, H-1470).

The facility also generates, on a non-routine basis, waste paint related material, identified by the EPA hazardous waste code F005. The waste paints have been generated mainly through housekeeping efforts by the facility. The facility generated approximately 1,000 pounds of the waste paint materials in the first nine months of 1992. This amount was generated on two separate occasions. The wastes are handled by Safety-Kleen Corp. (MOD095486312, H-1273).

Waste chromic acid is generated at the facility as a by-product of the chroming and de-chroming processes. The chrome wastes are generated in three different forms: liquid waste chromic acid, chrome sludge, and chrome-contaminated absorbent soacs. All three wastes are hazardous for the same reasons and are identified by at least the waste codes D002, D007 and often times include the codes D008 and F006. The chrome wastes have been handled by three different transporters and two different designated disposal facilities: to Laidlaw Environmental Services transported by Laidlaw, and to Cyanokem (MID098011992) transported by S.E.T. Environmental (ILD981957236, H-1254) and by Franks Vacuum Truck Service (NYD982792814, H-1663). Approximately 530 pounds of the chrome wastes in the three different forms are generated per month at Roto-Die.

Another hazardous waste generated in the chroming process is waste Bix Tuff Job, a cleaning material composed of 75% methylene chloride. The material is used to clean metal parts as a step in the chroming process. The waste is identified by the waste codes F002 and F003 and is handled by Laidlaw Environmental Services. Approximately 150 pounds of the waste is generated per month.

Two different types of waste coolant waters are generated at the facility. One type is generated in the facility's cooling towers and is identified as a D001, ignitable waste. The coolant used is ethylene glycol butyl ether. The other waste coolant water is generated through the facility's machining operations. The coolant is a mixture of water and Encool and is used to cool grinding, turning, and cutting machines. This waste cooling water is also identified by the waste code D001. Approximately 1,500 pounds of the waste waters are generated per month. Both waste waters are handled by Safety-Kleen (MOD095486312, H-1273).

Roto-Die generated a hazardous waste in the past that was hazardous because of its silver content. The process that generated the waste involved the development of film with the resulting photographs being used as templates for an engraving process. Roto-Die no longer uses this process, having discontinued the process around April of 1992. The waste was identified as a D011 waste and was generated at a rate of about 200 pounds per month. The waste had been handled by Laidlaw.

Roto-Die is a large quantity generator of hazardous waste based on the amounts of hazardous waste accumulated by the facility and by the average monthly generation rates.

UNSATISFACTORY FEATURES:

1) Incompatible wastes were not separated from each other by means of physical separation, or protected from each other by means of a dike, berm, wall, or other device in violation of 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.177(c). The generator was found to be storing incompatible hazardous wastes in the form of corrosives and flammables in the hazardous waste storage area without providing adequate physical separation of the wastes or by protecting the wastes by means of a physical barrier such as a dike, berm, wall, or other device. The corrosive materials in storage consisted of two fifteen gallon containers of a product that was no longer usable by the generator. The material was to be shipped off-site as a hazardous waste. The flammable wastes in storage consisted of a few fifty-five gallon drums of hazardous waste labelled flammable, the exact content of which was not recorded by the inspectors.

Hazardous wastes that are not compatible and that may react violently if mixed or brought into contact with each other, such as corrosives and flammables, must be either physically separated from each other or be protected from each other by a dike, berm, wall, or similar device in order to keep the wastes from contacting each other should one or more of the wastes be spilled.

Roto-Die must provide documentation to the DNR to verify the incompatible wastes have been separated or have been protected from each other as required by regulation. Roto-Die must also insure that all incompatible wastes are properly stored in the future and provide documentation verifying proper storage procedures have been implemented and the information has been disseminated to all personnel involved in the management of hazardous waste at the facility.

2) "No Smoking" sign was not placed in a readily visible location in the hazardous waste storage area in violation of 10 CSR 25-5.262(2)(C)2.D.(II). The generator failed to conspicuously place a "No Smoking" sign in the area of the hazardous waste storage area. The generator must post such a sign wherever there is a hazard from ignitable or reactive wastes. Roto-Die must provide documentation to the DNR verifying a "No Smoking" sign has been conspicuously posted in or near the hazardous waste storage area and in any other areas where a hazard may exist due to the presence of ignitable or reactive hazardous wastes.

3) The generator had accumulated greater than fifty-five gallons of hazardous waste at one satellite accumulation site in violation of 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(1). The generator had accumulated greater than fifty-five gallons of hazardous chrome waste at a satellite accumulation area adjacent to the chroming and de-chroming area. Three different wastes are accumulated in this area, all hazardous due to chrome content and corrosivity, but separate in their physical states. One waste is a liquid waste chromic acid, the second is a waste chrome sludge, and the third is composed of chrome contaminated absorbent socks. The three waste types are considered separate satellite accumulation areas, even though they are located in the same area.